

# Exhibit “1”

Julia Teague vs. Omni Hotels Management Corp, et al.

Julia Teague - March 02, 2020

Page 1	Page 3
<p>1 UNITED STATES DISTRICT COURT 2 FOR THE WESTERN DISTRICT OF TEXAS 3 AUSTIN DIVISION</p> <p>3 JULIA TEAGUE, ) 4 Plaintiff, ) C.A. NO. 5 VS. ) 1:19-cv-940 6 OMNI HOTELS MANAGEMENT ) 7 CORPORATION, and ) Jury Trial Demanded 8 TRT HOLDINGS, INC. ) 9 Defendant. )</p> <p>9 *****</p> <p>10 ORAL AND VIDEOTAPED DEPOSITION OF 11 JULIA TEAGUE 12 MARCH 2, 2020 13 *****</p> <p>14</p> <p>15 ORAL AND VIDEOTAPED DEPOSITION OF JULIA TEAGUE, 16 produced as a witness at the instance of the Defendants, 17 and duly sworn, was taken in the above-styled and 18 numbered cause on the 2nd day of March, 2020, from 19 9:38 a.m. to 12:40 p.m., and from 1:43 p.m. to 5:10 p.m., 20 before Katherine A. Buchhorn, Certified Shorthand 21 Reporter in and for the State of Texas, reported 22 stenographically, at the law offices of KAPLAN LAW FIRM, 23 PLLC, 406 Sterzing Street, Austin, Texas 78704, pursuant 24 to the Federal Rules of Civil Procedure and any 25 provisions stated on the record or attached hereto.</p>	<p>1 INDEX</p> <p>2 PAGE</p> <p>3 Appearances. .... 2 4 Stipulations ..... 4 5 Exhibits ..... 5 6 Requested Documents/Information. .... 9</p> <p>7</p> <p>8 JULIA TEAGUE 9 Examination by Ms. Steely. .... 9</p> <p>10</p> <p>11 Reporter's Certificate ..... 269 12</p> <p>13 Changes &amp; Signature ..... 271 14</p> <p>15 Acknowledgement of Deponent ..... 272 16 17 18 19 20 21 22 23 24 25</p>
<p>Page 2</p> <p>1 APPEARANCES 2 FOR THE PLAINTIFF, JULIA TEAGUE: 3 4 FOR THE DEFENDANTS, OMNI HOTELS MANAGEMENT 5 CORPORATION, and TRT HOLDINGS, INC.: 6 7 RACHEL POWITZKY STEELY 8 FOLEY GARDERE/FOLEY &amp; LARDNER LLP 9 1000 Louisiana 10 Suite 2000 11 Houston, Texas 77002 12 713.276.5500 13 rsteely@foley.com 14 15 VIDEOGRAPHER: 16 NANCY MARTIN 17 MARTIN LEGAL VIDEO 18 pmartin@martinlegalvideo.com 19 20 ALSO PRESENT: 21 Carissa Smith 22 23 24 25</p>	<p>Page 4</p> <p>1 STIPULATIONS 2 3 The attorneys for all parties present stipulate and 4 agree to the following items: 5 6 That the deposition of JULIA TEAGUE is being taken 7 pursuant to Notice; 8 9 That the deposition is being taken pursuant to the 10 Federal Rules of Civil Procedure; 11 12 That pursuant to FRCP Rule 30(e)(1), the signature 13 of the deponent was requested by the deponent or a party 14 before the completion of the deposition; 15 16 That the original transcript will be submitted 17 electronically for signature to the witness' 18 attorney(s), MATTHEW "MAFF" CAPONI and AUSTIN KAPLAN, 19 and that the witness or the witness' attorney(s) will 20 return the signed jurat and errata sheets to 21 KATHERINE A. BUCHHORN, CSR, within 30 days of the date 22 the electronic transcript is provided to the witness' 23 attorney. If not returned, the witness may be deemed to 24 have waived the right to make the changes, and an 25 unsigned copy may be used as though signed.</p>

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Julia Teague vs. Omni Hotels Management Corp, et al.  
Julia Teague - March 02, 2020

<p style="text-align: right;">Page 13</p> <p>1 A. I'm not -- I'm not sure about that. I was on 2 the FMLA when that announcement came out, so... 3 Q. When you say "when that announcement came out," 4 what are you talking about? 5 A. The announcement that Peter would replace Jim 6 Caldwell as president. 7 Q. Okay. But when you -- prior to the time you 8 went on FMLA, I guess -- your second or your first FMLA 9 leave? 10 A. My second. 11 Q. Okay. Prior to the time that you were on your 12 second FMLA leave, Jim Caldwell was the president of 13 Omni; is that right? 14 A. Yes. 15 Q. Okay. And your understanding, he was a shared 16 executive between TRT Holdings and Omni? 17 A. No. That was not -- that's not what I said. 18 Q. Okay. Great. Okay. Let me make sure I'm 19 clear. 20 You said that your -- you understood 21 TRT Holdings -- is it your understanding TRT Holdings 22 and Omni share some executives? 23 A. What -- what I'm saying is that they would 24 transfer. So when Jim was replaced by Peter as the 25 president of Omni Hotels, Jim then went to TRT Holdings.</p>	<p style="text-align: right;">Page 15</p> <p>1 duties entail of director of marketing communications? 2 A. That's a lot of -- 3 Q. Yeah. 4 A. -- a lot of job responsibilities. But I would 5 say, primarily, it was to drive the strategy for -- for 6 Barton Creek, the marketing strategy for Barton Creek. 7 And then under that falls digital marketing, website 8 management, communications, and PR strategy, social 9 media. And there's probably a lot more that I'm not 10 including here. 11 Q. So did, at some point, your job title change 12 when you were at Omni? 13 A. Once Omni acquired the resort, they already had 14 some directors of marketing within their existing 15 portfolio, and that's how they referred to the position 16 was director of marketing. 17 Q. So, first, it was marketing communications -- 18 A. Director of marketing communications. 19 Q. -- and then it became director of marketing? 20 A. That's what I started to be referred to as, 21 yes. 22 Q. Same job duties? 23 A. Yes. I -- actually, I would say that once Omni 24 acquired the resort -- primarily, the responsibilities 25 were similar; but there was more of a branding aspect to</p>
<p style="text-align: right;">Page 14</p> <p>1 Q. Got you. Okay. 2 A. And that's where I'm not sure what exact role 3 he held but... 4 Q. Are you aware of anyone who actually shared a 5 position with TRT and Omni at the same time? 6 A. I don't -- I guess with Peter's reporting in to 7 somebody from TRT, that might indicate a shared 8 employee. 9 Q. Okay. That's what your understanding was, as 10 far as the reporting relationship; is that right? 11 A. I understand that Peter was reporting in to 12 Blake and Bob Rowling. 13 Q. Okay. When did you start employment at Omni? 14 A. With Omni or at Barton Creek Resort? 15 Q. At -- with Omni. 16 A. The resort was acquired by Omni in mid 2013. 17 Q. And so you were already working at Barton Creek 18 Resort, correct? 19 A. Yeah. That's correct. 20 Q. And so when did you start at Barton Creek? 21 A. I started at Barton Creek in April of 2012. 22 Q. And what was your position when you started in 23 April of 2012 at Barton Creek? 24 A. Director of marketing communications. 25 Q. And what did the -- what was the -- did the job</p>	<p style="text-align: right;">Page 16</p> <p>1 it because Omni was a brand versus KSL Resorts. 2 Q. When you began your employment in 2012, who 3 your supervisor? 4 A. John Blanton. He was the director of sales and 5 marketing. 6 Q. And who are the different -- can you just kind 7 of go -- you can just do it from a timeline. Who were 8 your different supervisors when you were working at 9 Barton Creek? 10 A. John Blanton, initially, then Libby Nations, 11 and then Carissa Smith. 12 Q. I'm going to switch gears a little bit and go 13 into your background just a bit. 14 Where did you work before Barton Creek? 15 A. Just prior to Barton Creek I worked at a 16 communications agency called Cohn &amp; Wolfe; a global 17 communications agency. 18 Q. And what is a global communications agency? 19 A. A communications agency that supports clients 20 across the globe. 21 Q. Did you have any hotel clients at the time? 22 A. Yes. I worked on the Hilton business for seven 23 years. Or nearly seven years. 24 MS. STEELY: Easier to do it this way. 25 (Exhibit No. 1 marked)</p>

Julia Teague vs. Omni Hotels Management Corp, et al.  
Julia Teague - March 02, 2020

Page 17	Page 19
<p>1 Q. (BY MS. STEELY) I'm just going to hand you 2 what's been marked as Exhibit 1. Do you recognize 3 Exhibit No. 1? 4 A. Yes. 5 Q. And what is it? 6 A. It looks to be a copy of my resumé. 7 Q. Now, I'm going to -- see the bottom right hand, 8 there's these numbers? 9 A. Uh-huh. 10 Q. And I'm going to refer to those a lot of times 11 as "Bate numbers." And it says Teague 165. And if you 12 look, it goes all the way through Teague 169. 13 A. Okay. 14 Q. And I'll represent to you these are 15 documents -- when it says "Teague" on it, those are 16 documents that you and your counsel provided to the 17 defendants or produced to the defendants. 18 A. Okay. 19 Q. Do you see that? 20 A. Yeah. 21 Q. All right. So we have here Teague 165 through 22 169. 23 Are there any particular differences for 24 these four various copies? And also, so you know, since 25 we're trying to save some trees today, we've done a lot</p>	<p>1 Q. Okay. And when did you start using the 167, 2 which it has the Marriott added to it? 3 A. I don't recall the exact date I started using 4 this version. 5 Q. Do you recall the time period that you started 6 using it? 7 A. No. 8 Q. After you worked at Omni, you started working 9 at Marriott, correct? 10 A. Correct. 11 Q. Okay. How long were you working at Marriott 12 before you started looking for another job? 13 A. Well, when I heard from Carissa that the job at 14 Barton Creek had been reposted. If that's considered 15 looking for another job, then it would be at that point. 16 Q. Okay. And then after -- other than the Omni 17 position, did you start -- when did you start applying 18 for other positions when you were working at Marriott? 19 A. I believe we've provided you all of the dates 20 of positions that I sought out. Is that something I can 21 reference? 22 Q. I don't have it here. I'm asking you to the 23 best of your recollection, sitting here today. 24 A. Best of my recollection, I believe I applied 25 for positions as soon as May/June/July. I knew pretty</p>
Page 18	Page 20
<p>1 of two-sided exhibits. 2 A. Okay. 3 Q. So you're welcome to take a look at it, 4 whatever you need to do. 5 A. So there's several different copies. So are 6 you asking me to compare one specific one -- 7 Q. I'm just asking you -- there is -- is there any 8 particular date -- I've got four different copies, four 9 different items. I don't see, really, any differences 10 between them. Is there a particular difference that you 11 have with them -- 12 A. It looks like -- 13 (Simultaneous discussion interrupted by 14 the Reporter) 15 MS. STEELY: Yeah. 16 THE WITNESS: Sorry. 17 Q. P(BY MS. STEELY) Go ahead. 18 A. It looks to me like the one marked 167 -- 19 Q. Yes. 20 A. -- I had added Marriott International 21 experience at that point. 22 Q. Okay. So with -- when we're looking at 165 23 through 169, which is the form that you submitted to 24 Omni? 25 A. I can't be certain.</p>	<p>1 quickly that Marriott wasn't a position I wanted to stay 2 in. 3 Q. So what were you -- after you left Omni and 4 began working at the Marriott, what were you doing for 5 Marriott? 6 A. I was supporting 10 to 11 hotels with marketing 7 functions. 8 Q. And when you say you were supporting 10 to 11 9 hotels with marketing functions, what does that entail? 10 A. It would entail marketing strategy. It would 11 entail -- really, any kind of marketing support that 12 that hotel needed, I would be there to provide. 13 Q. Did you have an office? 14 A. I worked remotely. 15 Q. You worked -- so you worked remotely. Did you 16 travel quite a bit? 17 A. I did. 18 Q. Why did you believe that this wasn't working 19 for you at Marriott? 20 A. There were a couple of reasons it wasn't a good 21 fit for me. I think the first reason is that it was a 22 lot more travel than what I had initially intended or 23 what I understood the position to be, which was very 24 difficult for me with also juggling a newborn baby. 25 Q. Uh-huh.</p>

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Julia Teague vs. Omni Hotels Management Corp, et al.

Julia Teague - March 02, 2020

Page 137	Page 139
<p>1 April, it was an unpaid FMLA leave --</p> <p>2 Q. Right, but you --</p> <p>3 A. -- just to be fair.</p> <p>4 Q. -- went back to -- well, you were on F -- yes,</p> <p>5 because FMLA leave doesn't have to be paid, correct?</p> <p>6 A. Correct.</p> <p>7 Q. All right.</p> <p>8 A. Yes.</p> <p>9 Q. So -- but when you came back on April 24th, you</p> <p>10 were paid for that week, correct?</p> <p>11 A. I believe so.</p> <p>12 Q. Yes. Okay. By Omni.</p> <p>13 And so I'm trying to get the timelines --</p> <p>14 A. Uh-huh.</p> <p>15 Q. -- so -- understanding.</p> <p>16 So you were allowed to take your entire</p> <p>17 FMLA not interrupted, correct?</p> <p>18 A. Yes.</p> <p>19 Q. You actually came back to work on April 24th</p> <p>20 and finished out your family and medical leave, correct?</p> <p>21 A. Yes.</p> <p>22 Q. And then you were at work one more week, and</p> <p>23 then you were gone. Is that fair?</p> <p>24 A. Yes.</p> <p>25 Q. Is that correct?</p>	<p>1 which is just one month after the end of my FMLA leave.</p> <p>2 Q. It was posted but it wasn't filled, correct?</p> <p>3 A. I was told that it was slated to be filled in</p> <p>4 July -- July/August time frame.</p> <p>5 Q. But it wasn't, right?</p> <p>6 A. Correct.</p> <p>7 Q. And, in fact, there -- Omni Barton Creek Resort</p> <p>8 did not have a director of marketing position from --</p> <p>9 let me go back.</p> <p>10 They didn't have a director of marketing</p> <p>11 position that was filled during your time on FMLA,</p> <p>12 correct?</p> <p>13 A. Omni did not have the director of marketing</p> <p>14 position. They had the responsibilities of the director</p> <p>15 of marketing.</p> <p>16 Q. Okay. So let me -- let me just say that --</p> <p>17 let's do this. They didn't have anyone actually engaged</p> <p>18 in the role of director of marketing position during</p> <p>19 your FMLA leave, correct?</p> <p>20 A. I wasn't there, so --</p> <p>21 Q. Right --</p> <p>22 A. -- it's hard for me to say.</p> <p>23 Q. Right. So then you left. Your last day of</p> <p>24 employment on April 30th, 2018, correct?</p> <p>25 A. Correct.</p>
Page 138	Page 140
<p>1 A. Yes.</p> <p>2 Q. Is that a -- I just want to make sure we're --</p> <p>3 A. Yes, that's correct.</p> <p>4 Q. -- agreeable on the dates and on the timeline.</p> <p>5 A. Uh-huh. Yep.</p> <p>6 Q. So if we look at your pregnancy -- and I want</p> <p>7 to talk about your pregnancy-related claims.</p> <p>8 A. Uh-huh.</p> <p>9 Q. Is it your contention that you were not hired</p> <p>10 for the position in November of 2018, based on the</p> <p>11 pregnant -- your pregnancy that concluded on</p> <p>12 February 2nd, 2018?</p> <p>13 A. Yes.</p> <p>14 Q. So that -- there's an eight-month gap between</p> <p>15 the time you were pregnant and the time the position was</p> <p>16 filled, correct?</p> <p>17 A. Yes.</p> <p>18 Q. How is your pregnancy that occurred eight</p> <p>19 months before related to you not being hired for a</p> <p>20 position -- the director of marketing position in</p> <p>21 November 2018?</p> <p>22 A. I was told that the position -- when they</p> <p>23 reposted it, that the position was slated to return in</p> <p>24 July, and then Omni delayed the hiring until November.</p> <p>25 So the position was posted, I believe, in early June,</p>	<p>1 Q. And the -- there was not a director of</p> <p>2 marketing position from the time you left on April 30th</p> <p>3 until someone was hired in November of 2018, correct?</p> <p>4 A. I don't believe there was a person employed as</p> <p>5 a director of marketing during that time, but I believe</p> <p>6 the job responsibilities remained.</p> <p>7 Q. And the responsibilities -- and who did the</p> <p>8 responsibilities fall to?</p> <p>9 A. I believe, Carissa Smith.</p> <p>10 (Off the record discussion)</p> <p>11 Q. (BY MS. STEELY) So it was -- was it your</p> <p>12 understanding that the director of marketing position</p> <p>13 was actually eliminated during the reduction in force?</p> <p>14 A. That's what I was told.</p> <p>15 Q. Okay. And I know that's what you were told,</p> <p>16 but did you actually understand there was nobody in that</p> <p>17 position during the time from the time you left,</p> <p>18 April 30th, until November; that it was gone? The</p> <p>19 position was gone?</p> <p>20 A. I -- I wasn't there, so I can't speculate on</p> <p>21 that.</p> <p>22 Q. Okay. So you can't -- you can't say one way or</p> <p>23 the other?</p> <p>24 A. No. I mean, I wasn't there.</p> <p>25 Q. All right. So with regard to this -- to the</p>

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Julia Teague vs. Omni Hotels Management Corp, et al.  
Julia Teague - March 02, 2020

<p style="text-align: right;">Page 149</p> <p>1 possibility of, you know, being nine months pregnant and</p> <p>2 knowing that I had a limited time frame before I was</p> <p>3 going to be out of commission. I -- there may have been</p> <p>4 other ones. I'm not positive.</p> <p>5 Q. Do you -- when you said that -- let's keep</p> <p>6 going with the timeline. I think it's easier.</p> <p>7 So we were talking about this job. Did</p> <p>8 you apply -- you applied for several other positions,</p> <p>9 correct, with other companies?</p> <p>10 A. Yes.</p> <p>11 Q. Yeah.</p> <p>12 A. Uh-huh.</p> <p>13 Q. And I'm not going to sit here and go through</p> <p>14 every single one of them --</p> <p>15 A. Thank you.</p> <p>16 Q. -- but in the time period that you were looking</p> <p>17 for work, did you apply for any positions outside the</p> <p>18 Austin area?</p> <p>19 A. I don't believe so.</p> <p>20 Q. In 2018, did you apply for any positions</p> <p>21 outside the Austin area?</p> <p>22 A. No.</p> <p>23 Q. Okay. Since you've left Omni, have you applied</p> <p>24 for any positions outside the Austin area?</p> <p>25 A. When you say "outside of the Austin area,"</p>	<p style="text-align: right;">Page 151</p> <p>1 reach out to try to do anything that was out of the</p> <p>2 state of Texas, correct?</p> <p>3 A. No, I did not.</p> <p>4 Q. Ultimately, why did you accept the Marriott</p> <p>5 position?</p> <p>6 A. There were a couple of reasons that I accepted</p> <p>7 the Marriott position. One was that -- as I mentioned</p> <p>8 before, we had decided to -- we were in the process of</p> <p>9 building a home --</p> <p>10 Q. Uh-huh.</p> <p>11 A. -- and there was a certain time period where I</p> <p>12 knew that we would need to qualify for the mortgage and</p> <p>13 that I would need to have an income or we wouldn't</p> <p>14 qualify for that mortgage.</p> <p>15 I -- there were a few aspects about the</p> <p>16 Marriott position I liked. It was still in hospitality;</p> <p>17 so I was able to, you know, transfer what I had learned</p> <p>18 at Omni and from Hilton into that position. And it was</p> <p>19 a remote work-from-home position, which I had never done</p> <p>20 before and thought it would be interesting to try out.</p> <p>21 Q. So you were offered the Marriott position when</p> <p>22 you were still on family and medical leave, correct?</p> <p>23 A. Yes.</p> <p>24 Q. And you accepted the position when you were</p> <p>25 still on family and medical leave, correct?</p>
<p style="text-align: right;">Page 150</p> <p>1 based outside of the Austin area or -- because my --</p> <p>2 Q. Yes.</p> <p>3 A. -- role now, there's -- you know, I'm</p> <p>4 overseeing divisions in Austin, Houston, Dallas, and</p> <p>5 San Antonio; so there's work in other places outside of</p> <p>6 Austin.</p> <p>7 Q. Right. And you're right. It's based out of</p> <p>8 Austin.</p> <p>9 Did you apply for any positions where you</p> <p>10 would not be based out of Austin?</p> <p>11 A. I don't believe so.</p> <p>12 Q. And was it important for you to stay based out</p> <p>13 of the Austin area in -- with these positions?</p> <p>14 A. It was my preference.</p> <p>15 Q. Yeah. When you were working with Omni, did you</p> <p>16 provide Omni with -- with -- with information that you</p> <p>17 were not amenable to being relocated in another town?</p> <p>18 A. I think that there was a time period where we</p> <p>19 did a succession plan, and it was kind of -- the idea</p> <p>20 was to think forward in your career, and that there was</p> <p>21 a drop-down or, you know, some kind of "Are you</p> <p>22 relocatable?" And at that time my husband was in the</p> <p>23 Army, and we were not relocatable.</p> <p>24 Q. Okay. At this -- at the time that you were</p> <p>25 applying for these other positions, though, you did not</p>	<p style="text-align: right;">Page 152</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Why didn't you go ahead and go off your</p> <p>3 FMLA leave at that time?</p> <p>4 A. I didn't think it -- I don't -- I didn't think</p> <p>5 that one impacted the other. I thought that -- I knew I</p> <p>6 had already worked out a plan with our HR director and</p> <p>7 my supervisor to return for one day, and I worked out</p> <p>8 with Marriott to make sure that they were okay with me</p> <p>9 fulfilling that obligation. And I didn't -- I didn't</p> <p>10 think it was going to impact anything.</p> <p>11 Q. Isn't the reason that you didn't leave Omni in</p> <p>12 the middle of your family and medical leave is because</p> <p>13 you wanted to get back and receive an additional</p> <p>14 paycheck and your PTO prior to starting with Marriott?</p> <p>15 A. I'm sorry. What was the question?</p> <p>16 Q. Isn't the reason why you didn't go ahead and</p> <p>17 quit after you accepted your position with Marriott is</p> <p>18 because you wanted to come back to Omni to receive money</p> <p>19 before you left and started with Marriott?</p> <p>20 MR. CAPONI: Objection, leading.</p> <p>21 Q. (BY MS. STEELY) You can answer.</p> <p>22 A. The reason that -- I felt like I was fulfilling</p> <p>23 my obligation to Omni, and they were fulfilling their</p> <p>24 obligation to me.</p> <p>25 Q. Well, you weren't going to be working there</p>



Julia Teague vs. Omni Hotels Management Corp, et al.

Julia Teague - March 02, 2020

Page 161	Page 163
<p>1 Q. Your response is, "I definitely need to go back 2 to work so that we don't lose the deposit on the house 3 we're building. I've had a few opportunities come 4 along, so I'll keep you posted." That's your response 5 to her, right? 6 A. Yes. 7 Q. Okay. Well, you had already accepted a job 8 with Marriott at that time, right? 9 A. Correct. 10 Q. Okay. Why didn't you just tell her, "I already 11 have accepted a job at Marriott"? 12 A. Because I was going back to fulfill my 13 obligation to Barton Creek, and my plan was to let her 14 know after I fulfilled that obligation. 15 Q. On Saturday, May 5th, the day after you 16 received your last pay, you tell her that you've gotten 17 a job -- 18 A. Yes. 19 Q. -- at Marriott, right? 20 A. Yes. 21 Q. With regard to your position at Meritage, do 22 you have a bonus opportunity? 23 A. At Meritage Homes? 24 Q. Yes. 25 A. Yes.</p>	<p>1 program? Did you have retirement, 401(k), through Omni? 2 A. I did. 3 Q. Do you have it currently? 4 A. Yes. 5 Q. Did you have matching through Omni? 6 A. Yes. 7 Q. Do you have matching now? 8 A. Yes. 9 Q. Is it the same level of matching? 10 A. I'm not positive. 11 Q. Do you have -- did you have any kind of expense 12 account at Omni? 13 A. An expense account? 14 Q. Yes. 15 A. What do you mean? 16 Q. I'm going to pass that. 17 Did you have an automobile? Did they give 18 you an automobile allowance -- 19 A. At Omni? 20 Q. -- at Omni? 21 A. No. 22 Q. Okay. Do you have it now? 23 A. I do. 24 Q. Okay. How much is it? 25 A. It's either 700 or 750 a month.</p>
Page 162	Page 164
<p>1 Q. Okay. And what's your bonus opportunity? 2 A. 25 percent of my salary. 3 Q. And what's your salary? 4 A. Well, it just changed; but it has been 5 \$100,000. And then as of February 1st, 103,000. 6 Q. Do you have health insurance? 7 A. No, not through Meritage. 8 Q. Do you have it through your husband? 9 A. Yes. 10 Q. Did you have health insurance through your 11 husband when you were at Omni? 12 A. Yes. 13 Q. What about life insurance? Do you have it 14 through your husband? 15 A. I -- I don't know. 16 Q. I should just ask you: Do you know if you -- 17 do you have life insurance -- did you have life 18 insurance through Omni? 19 A. I don't know. 20 Q. Okay. Do you know if you have it from 21 Meritage? 22 A. I think that there are some plans where it's 23 like -- it comes -- like, a certain amount comes if 24 something were to -- I don't know. I -- I don't know. 25 Q. All right. What about any type of retirement</p>	<p>1 Q. Are you happy with your current job? 2 A. Yes. 3 Q. Do you believe that you will stay in this 4 position? Are you -- I mean -- strike that. 5 Are you currently looking for another job? 6 A. I'm not currently looking for another job. 7 Q. So I'm going to go back to our timeline a bit 8 with the -- with the RIF. 9 So you had gotten notification on the 10 29th -- 11 A. Official notification -- 12 Q. -- official notification. 13 A. -- yes. 14 Q. You went through the -- to the additional 15 meetings. 16 A. Uh-huh. 17 Q. And then you had some medical issue with regard 18 to your pregnancy; is that correct? 19 A. That's correct. 20 Q. And what did you have, then, at that point? 21 A. I had high blood pressure the next morning at 22 my regularly scheduled doctor's appointment. 23 Q. So the 30th, you had a doctor's appointment and 24 you had high blood pressure. 25 Had you had hypertension in previous</p>

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Julia Teague vs. Omni Hotels Management Corp, et al.  
Julia Teague - March 02, 2020

<p style="text-align: right;">Page 165</p> <p>1 pregnancies?</p> <p>2 A. Yes, I did.</p> <p>3 Q. Okay. Were you on bedrest in previous</p> <p>4 pregnancies?</p> <p>5 A. Yes.</p> <p>6 Q. And in your previous pregnancy, how long were</p> <p>7 on you bedrest?</p> <p>8 A. I think it was for a weekend.</p> <p>9 Q. Did the doctor, on January 30th, put you on</p> <p>10 bedrest?</p> <p>11 A. Yes.</p> <p>12 Q. Did you -- and you -- did you begin your FMLA</p> <p>13 leave at that time?</p> <p>14 A. I did.</p> <p>15 Q. Okay. Do you contend that the spike in blood</p> <p>16 pressure was the result of your work?</p> <p>17 A. I don't know conclusively. I'm not a medical</p> <p>18 doctor.</p> <p>19 Q. Uh-huh.</p> <p>20 A. I guess that's my answer.</p> <p>21 Q. Okay. Are you contending anything in this</p> <p>22 lawsuit as a result of the high blood pressure? Are you</p> <p>23 seeking any type of damages?</p> <p>24 A. I believe that finding out that your position</p> <p>25 is being eliminated or terminated -- it was a very</p>	<p style="text-align: right;">Page 167</p> <p>1 why they're attached. It's regard to your sick days. I</p> <p>2 don't think so.</p> <p>3 A. So I sent that --</p> <p>4 Q. Yeah. I don't -- I think that someone just</p> <p>5 attached that, and it shouldn't have been there. Right?</p> <p>6 A. I don't know.</p> <p>7 Q. I don't know. It's looks pretty --</p> <p>8 A. I'm trying to figure it out.</p> <p>9 Q. Trying to figure out that yourself, huh? I</p> <p>10 know. Just -- let's just ignore it and let's just --</p> <p>11 A. Okay. Yeah.</p> <p>12 Q. -- talk 211.</p> <p>13 A. I don't think it goes together.</p> <p>14 Q. How about that? Yeah.</p> <p>15 Okay. Go through a couple of these here.</p> <p>16 (Exhibit No. 17 marked)</p> <p>17 Q. (BY MS. STEELY) All right. So I'll hand you</p> <p>18 Exhibit No. 17. Sorry. This is the notice from your --</p> <p>19 this is the email -- well, what's Exhibit No. 17? Oh.</p> <p>20 Yeah, 17.</p> <p>21 A. It's -- looks like my note to HR and my</p> <p>22 supervisor and David, letting them know about the bad</p> <p>23 news I had received at my doctor's appointment and that</p> <p>24 I was being put on bedrest.</p> <p>25 Q. Okay.</p>
<p style="text-align: right;">Page 166</p> <p>1 stressful event, and it's my understanding that can lead</p> <p>2 to high blood pressure in a pregnancy.</p> <p>3 Q. Okay. Are you seeking any monetary damages as</p> <p>4 a result of that in this lawsuit?</p> <p>5 A. Yes.</p> <p>6 Q. All right.</p> <p>7 (Exhibit No. 16 marked)</p> <p>8 Q. (BY MS. STEELY) All right. I'm going to hand</p> <p>9 you what's been marked as Exhibit No. 16.</p> <p>10 MS. STEELY: Here's 16.</p> <p>11 Q. (BY MS. STEELY) So Exhibit No. 16 is Omni 211</p> <p>12 through 213, with a doctor's note -- I'm not sure about</p> <p>13 these two together, but I have them together -- from</p> <p>14 December of 2015.</p> <p>15 When was your daughter -- your first</p> <p>16 daughter born?</p> <p>17 A. December 20th.</p> <p>18 Q. Okay. And so a couple of days before your</p> <p>19 daughter was born, you were put on bedrest due to</p> <p>20 complications. Is that the doctor's note, on Omni 211?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. So does 212 and 213 go with this?</p> <p>23 A. Go with it?</p> <p>24 Q. I mean, is there anything having to do with</p> <p>25 your pregnancy, for 212 and 213? I'm just trying to see</p>	<p style="text-align: right;">Page 168</p> <p>1 (Exhibit No. 18 marked)</p> <p>2 Q. (BY MS. STEELY) Okay. I'm going to show you</p> <p>3 what's been marked as Exhibit No. 18. Exhibit No. 18 is</p> <p>4 marked Teague 347 to 348. Do you see this information?</p> <p>5 A. Yes.</p> <p>6 Q. And it looks like it's signed off by your</p> <p>7 doctor on February 9th, 2018. Is that right?</p> <p>8 A. Yes.</p> <p>9 Q. So did you fill out Teague 347 to 348, or did</p> <p>10 the doctor's office?</p> <p>11 A. It looks like I filled out part of it, and part</p> <p>12 of it somebody else did. That doesn't look like my</p> <p>13 handwriting.</p> <p>14 Q. So any other documentation that we would need</p> <p>15 to get with regard to the information that your</p> <p>16 physician filled out or had regarding your</p> <p>17 pregnancy-induced hypertension, we'd have to get from</p> <p>18 the doctor's office, correct?</p> <p>19 A. Beyond what I've provided?</p> <p>20 Q. Yes.</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Were you -- you're claiming damages</p> <p>23 based on pregnancy-induced hypertension from Omni,</p> <p>24 right?</p> <p>25 A. Like I said, I'm not a medical doctor --</p>



Julia Teague vs. Omni Hotels Management Corp, et al.  
Julia Teague - March 02, 2020

<p style="text-align: right;">Page 197</p> <p>1 with her, did you?</p> <p>2 A. I got along with Marie.</p> <p>3 Q. Okay.</p> <p>4 A. She even sent me flowers, actually, after I won</p> <p>5 my Director of Marketing of the Year award.</p> <p>6 Q. In 2014, correct?</p> <p>7 A. '15.</p> <p>8 Q. '15.</p> <p>9 And so as far as her being your</p> <p>10 supervisor, you saw no issue with her being your</p> <p>11 supervisor; is that correct?</p> <p>12 A. I saw no issue with Marie being my supervisor?</p> <p>13 Q. Yes.</p> <p>14 A. No.</p> <p>15 Q. Did you have discussions with anyone about</p> <p>16 having issues with her being your supervisor?</p> <p>17 A. No.</p> <p>18 Q. So you go forward and you --</p> <p>19 A. Other than Alayna telling me, "You don't want</p> <p>20 to report to her."</p> <p>21 Q. Okay. That's what you said she had said during</p> <p>22 that happy hour, correct?</p> <p>23 A. Yes.</p> <p>24 Q. After this June 15th email, do you recall</p> <p>25 telling anyone that the company -- telling anyone in a</p>	<p style="text-align: right;">Page 199</p> <p>1 that the pertinent people on property were aware.</p> <p>2 I remember her saying that she had</p> <p>3 received other resumes that seemed interesting.</p> <p>4 Q. Uh-huh.</p> <p>5 A. And then I remember asking if she wanted to see</p> <p>6 me back in the role. And she said, "I thought we worked</p> <p>7 well together, and my commitment to you is that I would</p> <p>8 recommend you for the next round."</p> <p>9 Q. Okay. And what did you understand the next</p> <p>10 round was going to be?</p> <p>11 A. I didn't know. And I think I asked about it,</p> <p>12 and she didn't seem to know either. She just said --</p> <p>13 oh, I think I said, you know, what the next steps were;</p> <p>14 and she said she wasn't sure. And I said -- she thought</p> <p>15 it would be some -- talking with someone at corporate.</p> <p>16 And I said, "Do you know about, like, the</p> <p>17 timing of when you're looking to hire the position?"</p> <p>18 And she said, "Two weeks ago."</p> <p>19 Q. Okay. So she really couldn't give you a</p> <p>20 timeline of when the position was going to be hired at</p> <p>21 that point, right?</p> <p>22 A. She indicated to me that she would like someone</p> <p>23 to start right away when she said, "Two weeks ago."</p> <p>24 Q. But you also understood that it was really not</p> <p>25 in her hands when somebody was going to start, correct?</p>
<p style="text-align: right;">Page 198</p> <p>1 roundabout -- or telling someone that the company would</p> <p>2 regret it if they didn't hire you for this position?</p> <p>3 A. No.</p> <p>4 Q. So now I want to move forward a little bit and</p> <p>5 talk about the application process. You interviewed</p> <p>6 with Ms. Smith in July; is that right?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And where did you interview with her?</p> <p>9 A. Barton Creek.</p> <p>10 Q. Tell me about the meeting you had with</p> <p>11 Ms. Smith in July of 2018.</p> <p>12 A. Is there anything specific you want to know?</p> <p>13 Q. Just tell me what you recall from the</p> <p>14 conversation.</p> <p>15 A. I recall that she told me that somebody high up</p> <p>16 at corporate was pulling the strings on this -- on this</p> <p>17 position. She didn't name who it was, but that's what</p> <p>18 she said. I think we -- she spent a lot of time, kind</p> <p>19 of, talking about the situation with David. She asked</p> <p>20 me a little bit about what I had done at Marriott and</p> <p>21 what I was doing there.</p> <p>22 I remember asking her if everyone was</p> <p>23 aware that I was interested in the position; and she</p> <p>24 said, yes, that everyone at corporate and, you know, on</p> <p>25 property was aware -- or not everyone on property, but</p>	<p style="text-align: right;">Page 200</p> <p>1 A. I did not know that.</p> <p>2 Q. Well, she told you that somebody else at</p> <p>3 corporate was pulling the strings, right?</p> <p>4 A. She told me somebody was pulling the strings on</p> <p>5 the position, yes.</p> <p>6 Q. Okay. At some point she also told you that the</p> <p>7 position was out of her hands, right? That it changed?</p> <p>8 A. Like --</p> <p>9 Q. The reporting structure?</p> <p>10 A. Oh, yes, yes, yes, she did.</p> <p>11 Q. And I'm sorry that -- yeah.</p> <p>12 A. She said that -- she said that the reporting --</p> <p>13 actually, I don't know -- I'm trying to remember of -- I</p> <p>14 think that might have been in a text message.</p> <p>15 Q. Okay. If you look back at the text, if you go</p> <p>16 to -- if you go to 265 --</p> <p>17 A. Yes.</p> <p>18 Q. -- it says -- from Ms. Smith to you, on</p> <p>19 August 1st, "Just to fill you in further, Marketing has</p> <p>20 pulled out of my direct report. I [sic] will now report</p> <p>21 directly to the GM."</p> <p>22 A. Yes.</p> <p>23 Q. "I'm still responsible for marketing at resort,</p> <p>24 however there is no reporting structure so I am</p> <p>25 completely out of the interview process."</p>

Julia Teague vs. Omni Hotels Management Corp, et al.  
Julia Teague - March 02, 2020

<p style="text-align: right;">Page 201</p> <p>1 And it says, "They are looking at it like 2 the DOM will be a third-party agent that provides a 3 service to me. In other words, all the responsibility 4 but no authority." 5 And she then states she has forwarded your 6 app -- forwarded all the applications to Alayna and 7 Caryn, right? 8 A. Correct. 9 Q. So you understand at this point, on August 1st, 10 the position is now going to be a peer position to 11 Carissa Smith? 12 A. I don't know that I understood it as a peer 13 position, just exactly how -- what she said. 14 Q. If you go to 266, which is the next page -- 15 A. Uh-huh. 16 Q. -- you ask her, "And you" -- "with you still 17 being responsible for resort marketing, it really 18 surprises me that you wouldn't continue to be involved 19 in the interview process and ultimately the hiring 20 decision." 21 A. Uh-huh. Yes. 22 Q. She responds, "Yes. But because they are a 23 peer, I will only be involved as a courtesy meet and 24 greet." Do you see that? 25 A. Yes.</p>	<p style="text-align: right;">Page 203</p> <p>1 Q. Yes. 2 A. The website. 3 Q. Okay. After Ms. Oram said, "Hey, listen, I'm 4 out of the -- the interview process" -- 5 A. Ms. Smith said that. 6 Q. -- oh, Ms. Smith said that -- 7 A. Uh-huh. 8 Q. -- what did you do next with regard to seeking 9 employment with Omni? 10 A. After Ms. Smith said she's out of the hiring 11 process? 12 Q. Yes. 13 A. I think I followed up with her. I can look at 14 it and see. I think I followed up with her. Actually, 15 I think it was emails that I followed up with her to see 16 if I was still in consideration because I hadn't heard 17 anything in a while. And then -- and then a corporate 18 recruiter reached out to me to arrange a brief chat. 19 Q. Okay. And who was the corporate recruiter? 20 A. Chris -- I'm not sure exactly how to say his 21 name. Brychell or Brychell. 22 Q. Brychell. And what -- do you recall the time 23 period that you spoke to Chris? 24 A. I believe it was in September. 25 Q. Okay. Tell me what all you can recall about</p>
<p style="text-align: right;">Page 202</p> <p>1 Q. All right. Then if you go to the last page -- 2 just go ahead to the last page of this deposition 3 exhibit and we'll get this deposition exhibit done. 4 If you go to Teague 268, the very last 5 page, on November 26th, she -- Ms. Smith texts you to 6 let you know that Stephanie Baker has been hired. Do 7 you see that? 8 A. Yes. 9 Q. All right. Did you know, prior to November 26, 10 that Stephanie Baker had been hired for the position? 11 A. No. 12 Q. So that's the first that you -- 13 A. I knew that -- I knew that they had extended 14 the offer to someone else. I didn't know who it was. 15 Q. Okay. 16 (Exhibit No. 24 marked) 17 Q. (BY MS. STEELY) I'm going to hand you what's 18 been marked as Exhibit No. 24. 19 Is this the new director of marketing 20 position that you applied for in the summer of 2008? 21 A. Yes, it looks to be so. 22 Q. Okay. And this, again, is Teague 12. And 23 where did you obtain a copy of this -- of the new 24 director of marketing position? 25 A. Where did I obtain a copy of it?</p>	<p style="text-align: right;">Page 204</p> <p>1 your conversation with Chris Brychell about the director 2 of marketing position. 3 A. I thought we had a really great call. He had 4 worked for Starwood and Marriott, and we knew some of 5 the same people there. So we -- I remember him asking 6 me if I had worked with so-and-so or so-and-so. And 7 then we talked about -- he kind of started off with, you 8 know, Barton Creek is going through a major renovation. 9 Q. Uh-huh. 10 A. And he talked about what they were looking for 11 in this director of marketing role. He said that the 12 position would report in to the general manager, and I 13 believe -- I thought he said it would sit on the 14 executive committee. 15 And then we talked about -- I think he 16 asked me, kind of, some ideas of -- or, you know, where 17 I thought the marketing should go for the resort, that 18 type of thing. 19 Q. Uh-huh. And after you had this interview, I 20 know you -- you had a couple of follow-ups, texts to him 21 or emails to him -- 22 A. Emails, uh-huh. 23 Q. -- trying to understand the position. Did you 24 talk to him again after that, other than the emails? 25 A. I don't think we ever spoke again.</p>

Julia Teague vs. Omni Hotels Management Corp, et al.

Julia Teague - March 02, 2020

Page 269	Page 271
1 UNITED STATES DISTRICT COURT	1 CHANGES AND SIGNATURE
2 WESTERN DISTRICT OF TEXAS	2 WITNESS NAME: JULIA TEAGUE
3 AUSTIN DIVISION	3 DATE OF DEPOSITION: MARCH 2, 2020
4 JULIA TEAGUE, )	4 Reason Codes: (1) to clarify the record; (2) to conform
5 )	5 to the facts; (3) to correct a transcription error;
6 Plaintiff, ) C.A. NO.	6 (4) other (please explain).
7 )	7
8 VS. ) 1:19-cv-940	8
9 )	9
10 OMNI HOTELS MANAGEMENT )	10
11 CORPORATION, and ) Jury Trial Demanded	11
12 TRT HOLDINGS, INC. )	12
13 )	13
14 Defendant. )	14
15 *****	15
16	16
17 REPORTER'S CERTIFICATION	17
18 ORAL AND VIDEOTAPED DEPOSITION OF	18
19 JULIA TEAGUE	19
20 MARCH 2, 2020	20
21 *****	21
22	22
23 I, Katherine A. Buchhorn, Certified Shorthand	23
24 Reporter in and for the State of Texas, hereby certify	24
25 to the following:	25
1 That the witness, JULIA TEAGUE, was duly sworn by	
2 the officer and that the transcript of the oral	
3 deposition is a true record of the testimony given by	
4 the witness;	
5	
6 That a copy of this certificate was served on all	
7 parties and/or the witness shown herein on	
8 March 14, 2020.	
9	
10 *_*_*_*	
11 *_*_*_*	
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Page 270	Page 272
1 I further certify that pursuant to FRCP Rule	1 ACKNOWLEDGMENT OF DEPONENT
2 30(f)(1) that the signature of the deponent:	2
3	3 I, JULIA TEAGUE, do hereby certify that I have read
4 ___ was requested by the deponent or a party before	4 the foregoing pages and that the same is a correct
5 the completion of the deposition and that the signature	5 transcription of the answers given by me to the
6 is to be before any notary public and returned within	6 questions therein propounded, except for the corrections
7 30 days from date of receipt of the transcript. If	7 or changes in form or substance, if any, noted on the
8 returned, the attached Changes and Signature Page	8 attached errata page.
9 contains any changes and the reasons therefore.	9
10 ___ was not requested by the deponent or a party	10
11 before the completion of the deposition.	11 JULIA TEAGUE DATE
12 I further certify that I am neither counsel for,	12
13 related to, nor employed by any of the parties or	13 ___ No Changes Made ___ Errata Sheet(s) Attached
14 attorneys in the action in which this proceeding was	14
15 taken, and further that I am not financially or	15
16 otherwise interested in the outcome of the action.	16 JULIA TEAGUE, Plaintiff
17 Certified to by me this 14th day of March, 2020.	17 v.
18	18 OMNI HOTELS MANAGEMENT CORPORATION, and
19	19 TRT HOLDINGS, INC., Defendant
20	20
21	21
22	22
23	23
24	24
25 Job No. 030220.Teague	25 Job No. 030220.Teague

Katherine A. Buchhorn, CSR

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